

December 9, 2008

**Comments on the Dec. Phase 1B draft report
from the biomass rep**

by Gregg Morris, Director of the Green Power Institute

We have very limited comments on the December draft of the phase 1b report.

We note that, as agreed upon at the Nov. 14 meeting of the SSC, the “RETI Net Short” line has been removed from Figure 5-1. However, it was not removed from Figure 5-4, and should be.

We note that in Table 5-6 the uncertainty bounds for fuel cost have been reduced from +/- 30% in the November draft to +/- 20% in the December draft. The biomass rep worked with Black and Veatch in the development of the +/- 30% number that was used in November, but was not consulted about the reduction to +/- 20%. Biomass fuel prices are highly location-specific, and vary regionally between the north and south of the state. We believe that a +/- 30% range should be used in the analysis.

I am disappointed to see that the uncertainty analysis in the latest draft has been, as far as I can tell, eviscerated. As a member of both the 1a and 1b working groups, I have to say that the understanding I thought we had about performing uncertainty analysis has not been carried through, with the result that we are seriously understating the uncertainties involved in the analysis. The November version of the section on uncertainty should be retained, unless a compelling case is made for this major alteration.